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November 1, 2021

By ECF

Hon. Vernon S. Broderick
United States Courthouse
Southern District of New York
40 Foley Square, Room 415
New York, New York 10007

Re: Cordoba v. Rivington Laundromat & Dry Cleaning, Inc., et al.
Docket No.: 21-cv-6878 (VSB)

Dear Judge Broderick:

My firm represents the Defendant Rivington Laundromat & Dry Cleaning, Inc. ("Rivington").

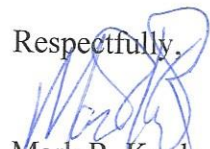
I respectfully submit ON CONSENT this Letter Motion seeking a thirty (30) day extension of Defendant Rivington's time to respond to the Complaint. The Summons and Complaint were served through the Secretary of State. Rivington recently received a copy of the Complaint, and I was retained on Thursday, October 28.

Rivington was incorrectly named as a Defendant. Plaintiff alleges in the Complaint that she asserts claims arising out of her employment since November 2018. However, Rivington closed on a sale of all its assets as a laundromat in early September 2018. I provided these facts to Plaintiff's counsel, who stated that he will amend the Complaint shortly to remove Rivington as a party, and to add a different party as a Defendant.

Plaintiff's counsel, Michael Faillace, has consented to this request and Motion.

This is the first request for an extension.

I thank Your Honor for consideration of this Motion.

Respectfully,

Mark R. Kook

Cc: All Counsel (by e-file)